

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

Bryan A Reo,

Plaintiff,

— vs —

Ludivine Joan Claudia
Reynaud,

Defendant.

Case No.: 1:22-cv-00510

Judge: James Gwin

Motion for a Stipulated Joint
Protective Order

The Parties have agreed to be bound by a Joint Stipulated Protective Order, based on Appendix L to the Local Civil Rules for the Northern District of Ohio, should the Court agree that such an Order is appropriate. The attached submission includes one change from Appendix L of which the Court should be aware before acting on this Motion: the Parties have added the phrase “and dispositive motion practice” in brackets in Section 5(b). The Parties jointly move the Court to adopt the attached Order given that sensitive personal, intimate and financial information has been and will be disclosed in discovery between them.

Respectfully submitted,

/s/ Raymond V. Vasvari, Jr.

RAYMOND V. VASVARI, JR. (0055538)

vasvari@vasvarilaw.com

K. ANN ZIMMERMAN (0059486)

zimmerman@vasvarilaw.com

VASVARI | ZIMMERMAN

20600 Chagrin Boulevard

Suite 800 Tower East

Shaker Heights, Ohio 44122

Telephone | 216.458.5880

Telecopier | 216.302.7000

Attorneys for Defendant

Ludivine Joan Claudia Reynaud

— CERTIFICATE OF SERVICE —

The foregoing was filed today, Tuesday, September 27, 2022, via the Court's Electronic Filing System. Service will be made upon represented parties and copies may be obtained through operation of the CM | ECF System.

Respectfully submitted,

/s/ Raymond V. Vasvari, Jr.

RAYMOND V. VASVARI, JR. (0055538)

vasvari@vasvarilaw.com

K. ANN ZIMMERMAN (0059486)

zimmerman@vasvarilaw.com

VASVARI | ZIMMERMAN

20600 Chagrin Boulevard

Suite 800 Tower East

Shaker Heights, Ohio 44122

Telephone | 216.458.5880

Telecopier | 216.302.7000

Attorneys for Defendant

Ludivine Joan Claudia Reynaud

– Certificate of Compliance –

The undersigned certified that this document complies with the requirement of L. R. Civ. 7.1(f) in that, exclusive of appendices, each of the statement checked below is true;

- ☒ It relates to a non-dispositive motion and is less than fifteen (15) pages;
- ☐ It relates to a dispositive motion in a case designated as on the expedited track, and is not longer than ten (10) pages;
- ☐ It relates to a dispositive motion in a case designated as administrative or standard track, or in a case not yet given a differentiated case management track designation, and is not longer than twenty (20) pages;
- ☐ It relates to a dispositive motion in a case designated as on the complex track, and is not longer than thirty (30) pages;
- ☐ It relates to a dispositive motion in a case designated as on the mass tort track, and is not longer than forty (40) pages;
- ☐ It exceeds fifteen (15) pages in any event, and it thus contains a brief statement of the issue(s) to be decided, a brief statement of the argument(s) made, and tables of both contents and of the authorities cited therein.

Respectfully submitted

/s/ Raymond V. Vasvari, Jr.

Raymond V. Vasvari, Jr. (0055538)

vasvari@vasvarilaw.com

VASVARI | ZIMMERMAN

One of the attorneys for Plaintiffs